

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

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IN RE: REQUEST FOR JUDICIAL  
ASSISTANCE FROM THE 30TH  
LABOR COURT OF ISTANBUL,  
ANADOLU, TÜRKİYE IN THE  
MATTER OF RAMAZAN SILAH V.  
TURKEY HALKBANK JOINT-STOCK  
COMPANY

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Case No. **1:24MC01574**

**DECLARATION OF TRIAL ATTORNEY KRYSTA M. STANFORD**

I, Krysta M. Stanford, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a Trial Attorney at the U.S. Department of Justice, Civil Division, Office of Foreign Litigation, Office of International Judicial Assistance. I make this declaration upon information and belief based upon the attached exhibits and communications received from the 30th Labor Court of Istanbul, Anadolu, Türkiye (“Turkish Court”). I make this declaration in support of the Government’s request, pursuant to 28 U.S.C. § 1782(a), for an Order appointing me Commissioner for the purpose of obtaining documents from X Corporation (“X”).

2. In connection with a pending judicial proceeding captioned *Ramazan Silah v. Turkey Halkbank Joint-Stock Company*, Foreign Reference Number 2023/396, the Turkish Court issued a Letter of Request seeking information from X. A true and correct redacted copy of the Letter of Request received from the Turkish Court is attached as Exhibit 1.

3. The specific information requested by the Turkish Court is reflected in a subpoena addressed to X, which the United States intends to serve (in substantially similar format) upon my appointment as Commissioner. A copy of the proposed subpoena is attached as Exhibit 2.

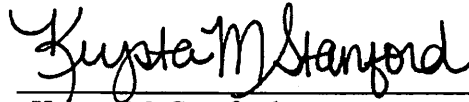
4. Counsel for X indicated to the U.S. Government that X does not oppose the appointment of a Department of Justice Attorney as commissioner, but it reserves all rights in how it will respond to the subpoena.

5. In order to assist the Turkish Court in obtaining the requested information, I respectfully request that this Court enter the proposed Order attached to the Application appointing me Commissioner.

6. No previous application for the relief sought herein has been made.

I declare under penalty of perjury that the foregoing is true and correct.

Washington, D.C.  
December 19, 2024

A handwritten signature in black ink, reading "Krysta M. Stanford". The signature is written in a cursive, flowing style. The first name "Krysta" is written with a large, stylized "K" and "y". The middle initial "M" is smaller and sits between the first and last names. The last name "Stanford" is written with a large "S" and a trailing flourish.

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Krysta M. Stanford  
Trial Attorney